## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re: Chapter 9

CITY OF DETROIT, MICHIGAN Case No. 13-53846

Debtor. Hon. Steven W. Rhodes

## AMENDED NOTICE OF DEPOSITION OF NICOLETTE BATESON

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc. ("Assured") and National Public Finance Guarantee Corporation ("National"), Berkshire Hathaway Assurance Corporation ("BHAC"), U.S. Bank National Association, as Indenture Trustee (the "Trustee") for the DWSD Bonds, the Ad Hoc Bondholder Committee<sup>1</sup> (the "Ad Hoc Committee"), and Oakland County, Michigan ("Oakland" and together with Assured, National, BHAC, the Trustee and the Ad Hoc Committee, the "DWSD Discovery Parties"), by and through their counsel,

<sup>&</sup>lt;sup>1</sup> The Ad Hoc Bondholder Committee members, Fidelity Management & Research Company, Eaton Vance Management and Franklin Advisers, Inc., through various institutional funds they or their affiliates manage, hold DWSD Bonds.

will take the deposition upon oral examination of **Nicolette Bateson** at the Westin Book Cadillac Detroit hotel, located at 1114 Washington Blvd., Detroit, MI 48226 on **Friday**, **July 18**, **2014** or at any other such date or place to which the parties mutually agree. The deposition will begin at **9:00 a.m.**, and continue until completed.<sup>2</sup>

The deposition will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition.

The deposition will be recorded by stenographic and audio visual means, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and Federal Rules of Bankruptcy Procedure.

<sup>&</sup>lt;sup>2</sup> The DWSD Discovery Parties issue this notice jointly for the sake of efficiency and convenience only. This notice shall be treated as if each party had served the notice separately.

Dated: July 14, 2014

/s/ Lawrence A. Larose

Lawrence A. Larose Samuel S. Kohn Robert A. Schwinger CHADBOURNE & PARKE LLP 30 Rockefeller Plaza

New York, NY 10112 Telephone: (212) 408-5100 Fax: (212) 541-5369 <u>llarose@chadbourne.com</u> skohn@chadbourne.com

rschwinger@chadbourne.com

- and -

Robin D. Ball CHADBOURNE & PARKE LLP 350 South Grand Ave., 32nd Floor Los Angeles, CA 90071

Telephone: (213) 892-2025

Fax: (213) 892-2045 rball@chadbourne.com

Counsel for Assured Guaranty Municipal Corp.

## Respectfully submitted

/s/ Guy S. Neal
James F. Bendernagel, Jr.
Guy S. Neal
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 736-8041

Fax: (202) 736-8711 jbendernagel@sidley.com

gneal@sidley.com

Jeffrey E. Bjork
Gabriel MacConaill
SIDLEY AUSTIN LLP
555 West Fifth Street, Suite 4000
Los Angeles, California 90013
Telephone: (213) 896-6000
Fax: (213) 896-6600
jbjork@sidley.com
gmacconaill@sidley.com

- and

/s/ Paul R. Hage

Paul R. Hage JAFFE RAITT HEUER & WEISS P.C.

27777 Franklin, Suite 2500

Southfield, MI 48034

Telephone: (248) 351-3000

Fax: (248) 351-3082 phage@jaffelaw.com

Counsel for National Public Finance Guarantee Corp. /s/ My Chi To
My Chi To
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-7435
Fax: (212) 909-6836
mcto@debevoise.com

Counsel for Berkshire Hathaway Assurance Corporation

/s/ Joseph M. Fischer
Joseph M. Fischer (P13452)
Robert A. Weisberg (P26698)
Christopher Grosman (P58693)
CARSON FISCHER, P.L.C.
4111 Andover Road, West
Second Floor
Bloomfield, Michigan 48302
Telephone: (248) 644-4840
Fax: (248) 644-1832
JFischer@CarsonFischer.com
RWweisberg@CarsonFischer.com
CGrosman@CarsonFischer.com

- and -

Sara K. MacWilliams (P67805)
Jaye Quadrozzi (P71646)
YOUNG & ASSOCIATES
27725 Stansbury Blvd., Suite 125
Farmington Hills, MI 48334
Telephone: (248) 353-8620
Fax: (248) 479-7828
macwilliams@youngpc.com
quadrozzi@youngpc.com

Counsel for Oakland County, Michigan /s/ David E. Lemke
David E. Lemke (TN13586)
Michael R. Paslay (TN11092)
Ryan K. Cochran (TN25851)
Courtney M. Rogers (TN25664)
WALLER LANSDEN DORTCH &
DAVIS, LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
Telephone: (615) 244-6380
Fax: (615) 244-6804
david.lemke@wallerlaw.com
mike.paslay@wallerlaw.com
ryan.cochran@wallerlaw.com
courtney.rogers@wallerlaw.com

- and -

Robert J. Diehl, Jr. (MI31264) Jaimee L. Witten (P70068) BODMAN PLC 1901 St. Antoine Street, 6th Floor Detroit, Michigan 48226 Telephone: (313) 393-7597 Fax: (313) 393-7579 rdiehl@bodmanlaw.com jwitten@bodmanlaw.com

Counsel for U.S. Bank National Association, as Indenture Trustee for the DWSD Bonds

## /s/ William W. Kannel

William W. Kannel Adrienne K. Walker MINTZ, LEVIN, COHN, FERRIS, GLOVSKY and POPEO, P.C. One Financial Center Boston, Massachusetts 02111 Telephone: (617) 542-6000 Fax: (617) 542-2241

wwkannel@mintz.com awalker@mintz.com

- and -

Andrew J. Gerdes ANDREW J. GERDES, P.L.C. 321 W. Lake Lansing Road P.O. Box 4190 East Lansing, Michigan 48826-4190 Telephone: (517) 853-1300 Fax: (517) 853-1301 agerdes@gerdesplc.com

Attorneys for Fidelity Management & Research Company, Eaton Vance Management, and Franklin Advisers, Inc., members of the Ad Hoc Bondholder Committee